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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. Rm. 222  
Washington, D.C. 20554

RE: In the Matter of Amendment of Section 25.131 of the Commission's Rules  
and Regulations to Eliminate the Licensing Requirement for Certain Interna-  
tional Receive-Only Earth Stations  
CC Docket No. 93-23

Dear Ms. Searcy:

Transmitted for filing on behalf of Prodelin Corporation is an original and four  
copies of comments in the above referenced matter.

Should any questions arise, please contact Nicholas Moldovan at 704-464-  
4141.

Sincerely,

Nicholas Moldovan  
Chief Engineering Officer

NM/sf

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Amendment of Section 25.131

of the Commission's Rules

and Regulations to Eliminate the

Licensing Requirements for Certain

International Receive-Only Earth Stations)

)  
)  
) CC Docket No. 93-23  
) RM-7931  
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**COMMENTS OF PRODELIN CORPORATION**

Prodelin Corporation, a U.S. company based in North Carolina specializing in the design and manufacture of parabolic antennas for satellite communications systems, respectfully requests that the Commission act promptly to implement revisions to Part 25 of the Commission's Rules to eliminate licensing requirements for receive-only antennas operating with international fixed satellites.

Prodelin's primary focus is on commercial antenna applications of VSATs as well as receive-only antennas. Prodelin therefore has a strong interest in the outcome of the

rulemaking proceeding initiated by the Commission on March 8, 1993. In this Notice of Proposed Rulemaking, the Commission tentatively concludes that the same factors which prompted it to eliminate the licensing requirements for domestic receive-only earth stations are also prevalent in the international satellite market place, and that the time has come to remove the licensing requirement for international receive-only earth stations. Prodelin strongly supports this conclusion.

The international satellite market place has become increasingly competitive and new technology has made possible new services capable of being obtained using smaller and less costly antennas. These benefits, however, are frustrated by the need for federal licensing which, for most individuals and small businesses, is an unfamiliar and burdensome process.

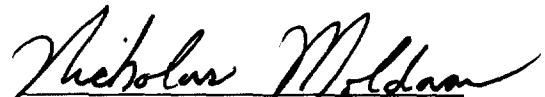
The changes proposed in the rulemaking are comparable to those in effect for U.S. domestic receive-only antennas since 1979. This experience has demonstrated that there are no technical reasons for licensing receive-only antennas. By definition, these antennas do not transmit and therefore cannot

cause interference. For those operating downlinks in frequencies shared by other uses and who want protection from interference, the voluntary registration process is an adequate mechanism. In view of the lack of technical justification for continuing licensing and in view of Comsat's clarification that such licensing is not required to satisfy obligations to INTELSAT, the Commission should eliminate such licensing. This would facilitate the sale of receive-only antennas in the U.S. and would enable smaller users and businesses to obtain the benefits of the increasing number of data and video information services now available in the international satellite market.

Accordingly, Prodelin respectfully urges the Commission to act promptly to amend Section 25.131 of the Commission's Rules to eliminate the licensing requirement.

Respectfully submitted,

PRODELIN CORPORATION

A handwritten signature in cursive script, reading "Nicholas Moldan".

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